

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF PIMA

IN THE MATTER OF:

NO: C-20044898

MILLENIUM MOTORS, LLC,  
AND  
MIH REAL ESTATE INVESTORS, INC.,  
AND  
ALL REAL PROPERTY, VEHICLES AND  
PERSONAL PROPERTY SET FORTH IN  
APPENDIX ONE, ATTACHED,  
  
SEIZED IN COUNTER NARCOTICS  
ALLIANCE CASE NUMBER:  
M04070401

COMPLAINT  
(Non-Classified Civil,  
In Rem Forfeiture)  
  
(Assigned to Judge John Kelly,  
Division 21)

Plaintiff alleges:

**JURISDICTION AND VENUE**

1. This action is brought pursuant to A.R.S. §§ 13-2301(D)(4 and 6), 13-2314(G), 13-2317, 13-3413, and 13-4301 et seq.

2. Under the Racketeering, Drug, and Forfeiture chapters of the Arizona Revised Statutes, the State is empowered to bring a civil in rem forfeiture action to enforce their provisions and to forfeit property or interests in property pursuant to A.R.S. §§ 13-2301(D)(4 and 6), 13-2314(G), 13-2317, 13-3413 and 13-4301 et seq.

3. The Superior Court has jurisdiction to enter appropriate orders, including forfeiture orders, pursuant to A.R.S. §§ 13-2301(D)(4 and 6), 13-2314(G), 13-2317, 13-3413 and 13-4301 et seq.

4. The property was seized in Pima County within the State of Arizona in July through October, 2004, and has a value of approximately \$5,979,430.00. The Superior Court has

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 jurisdiction over this matter pursuant to A.R.S. §13-4302.

2 5. The property was seized in Pima County and venue is therefore appropriate in  
3 Pima County pursuant to A.R.S. §13-4303.

4 **PARTIES**

5 6. The plaintiff is the State of Arizona.

6 7. The defendants in rem are: **SEE APPENDIX ONE**, attached hereto, which  
7 property and interests in property are forfeit to the STATE OF ARIZONA pursuant to the  
8 provisions of A.R.S. §§ 13-2301(D)(4 and 6), 13-2314(G), 13-2317, 13-3413 and 13-4301 et  
9 seq., including A.R.S. 13-4313.

10 8. The following persons or entities may have an interest in the property subject  
11 to this action: **SEE APPENDIX TWO**, attached hereto. **APPENDIX TWO** will be  
12 supplemented as secured owners and/or interest holders and non-secured owners and/or interest  
13 holders become known., and service of notice of the forfeiture proceedings will be made as those  
14 persons or entities become known.

15 9. All persons known to have an interest in the property have been served with a  
16 Notice of Pending Forfeiture pursuant to A.R.S. § 13-4307 and/or are being served with this  
17 Complaint providing notice of the pending forfeiture action pursuant to A.R.S. 13-4311. Liens  
18 and/or constructive seizures have been made and recorded in the appropriate public records  
19 regarding the subject real property and motor vehicles. Supplemental service will be made as  
20 indicated in paragraph 8, above.

21

**CLAIM FOR RELIEF**

**In Rem Forfeiture**

10. This is an in rem forfeiture action pursuant to the Racketeering, Drug and Forfeiture chapters of the Arizona Revised Statutes, including A.R.S. §§ 13-2301(D)(4 and 6), 13-2314(G), 13-2317, 13-3413 and 13-4301 et seq., including A.R.S. 13-4313.

11. Defendant property consists of: **SEE APPENDIX ONE**, attached hereto

12. The property is subject to forfeiture pursuant to the Racketeering, Drug and Forfeiture chapters of the Arizona Revised Statutes, including A.R.S. §§ 13-2301(D)(4 and 6), 13-2314(G), 13-2317, 13-3413 and 13-4301 et seq., including A.R.S. 13-4313, because it is the proceeds of, and/or was used or intended to be used to commit or facilitate the commission of, and/or represents the property and/or interests in property of persons or entities that acquired or maintained proceeds through and/or committed or facilitated the commission of the following conduct in violation of the Racketeering, Drug and Forfeiture Chapters of Title 13 of the Arizona Revised Statutes: possession of marijuana; possession of marijuana for sale; sale of marijuana; importation of marijuana for sale; transportation of marijuana for sale; transfer of marijuana; offer to sell, transport, transfer, import and/or possess marijuana for sale; possession of drug paraphernalia; forgery, scheme or artifice to defraud; obstructing or hindering criminal investigations or prosecutions; asserting false claims, intentional or reckless false statements or publications concerning land for sale or lease or sale of subdivided lands or sale and mortgaging of unsubdivided lands; resale of realty with intent to defraud; money laundering; participating in or assisting or directing a criminal syndicate; illegal control of or conducting or directing or participating in an enterprise; and conspiracy as to all the preceding conduct.

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1           The facts, events, circumstances and reasonable inferences arising therefrom giving rise  
2 to the forfeiture occurred as set forth in **APPENDIX THREE** attached hereto and incorporated  
3 herein.

4                   13. The property described in **APPENDIX ONE** constitutes property or  
5 interests in property: acquired or maintained by a person in violation of A.R.S. 13-2312; interests  
6 in, security of, claims against or property, office, title, license or contractual right of any kind  
7 affording a source of influence over any enterprise or other property which a person has acquired  
8 or maintained an interest in or control of, conducted or participated in the conduct of in violation  
9 of A.R.S. 13-2312; proceeds traceable to an offense included in the definition of racketeering  
10 [A.R.S. 13-2301(D)(4)]; monies, negotiable instruments, securities, and other property used or  
11 intended to be used in any manner or part to commit or facilitate the commission of racketeering  
12 conduct; property, equipment, containers, materials, money, records, books, products and  
13 vehicles used or intended for use in violation of the Drug chapter of the Arizona Revised Statutes  
14 and/or proceeds thereof; and/or substitute assets of such property or interests in property made  
15 unavailable.

16                   14. Through the acts described above, or the proceeds of same, the above  
17 persons have thereby subjected their interest in, security of, claims against, or property, office,  
18 title, license or contractual right of any kind to the forfeiture provisions and procedures of A.R.S.  
19 §§ 13-2301(D)(4 and 6), 13-2314(G), 13-2317, 13-3413 and 13-4301 et seq., including A.R.S.  
20 13-4313, and any other applicable sections of Title 13, Chapters 23, 34 and 39 of the Arizona  
21 Revised Statutes. Said interests are therefore forfeit to the State.

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1                   15. The aforesaid property and its proceeds is forfeit to the State because they  
2 were used or intended for use as provided by A.R.S. §§ 13-2301(D)(4 and 6), 13-2314(G), 13-  
3 2317, 13-3413 and 13-4301 et seq., and/or are the actual or intended proceeds thereof.

4                   16. Pursuant to A.R.S. § 13-4310(F), the property described above has been  
5 forfeited in its entirety, including proceeds thereof, to the extent not recovered by claimants  
6 pursuant to A.R.S. §§ 13-2314(G), 13-3413, 13-4304, 13-4310(D), 13-4311, and 13-4313, from  
7 the time of the first occurrence of said act or acts, subject only to the recovery of such lawful  
8 interests as are claimed and established by claimants under A.R.S. §§ 13-2314(G), 13-3413,  
9 13-4304, 13-4310(D), 13-4311, and 13-4313.

10  
11                   **PRAYER FOR RELIEF**

12                   WHEREFORE, plaintiff respectfully requests that:

13                   1. The Court enter an order forfeiting to the STATE OF ARIZONA the property  
14 described in Appendix One and all interests therein as provided by A.R.S. §§ 13-2301(D)(4 and  
15 6), 13-2314(G), 13-2317, 13-3413 and 13-4301 et seq., including A.R.S. 13-4313.

16                   2. The Court enter an order that the property and interests described in the  
17 Claim for Relief are forfeit to the STATE, in the event that no claimant makes the proof required  
18 by A.R.S. §§ 13-2314(G), 13-3413, 13-4304, 13-4310(D), 13-4311, and 13-4313, within the time  
19 prescribed therein, and order disposition pursuant to A.R.S. §§ 13-4311, 13-4314 and 13-4315.

20                   3. The Court enter an order declaring that the proceeds of all property forfeit to  
21 the STATE from the time of the forfeiture to the time of disposition are held in constructive trust  
22 for the benefit of the STATE for satisfaction of further orders of the Court pursuant to A.R.S. §§

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 13-2314, 13-3413, and 13-4301 et seq., including A.R.S. 13-4310(F) and 13-4313.

2 4. The Court order claimants, if any, to pay the State's costs and expenses of  
3 investigating the conduct alleged above, the matter of complaint herein, court costs, and the costs  
4 of prosecuting this forfeiture matter, including reasonable attorneys' fees, pursuant to A.R.S. §  
5 13-4314(E).

6 5. The Court enter an order providing that this Court retain jurisdiction of this  
7 action in order to implement and carry out the terms of all orders and decrees that may be entered  
8 herein, and in order to entertain any suitable applications or motions by the State or any  
9 conservator or receiver appointed by the Court for additional relief within the jurisdiction of the  
10 Court.

11 6. The Court grant such other and further relief as the Court deems just and  
12 proper.

13 DATED this \_\_\_\_\_ day of October, 2004.

14 BARBARA LAWALL  
15 PIMA COUNTY ATTORNEY  
16  
17  
18  
19

20 \_\_\_\_\_  
21 THOMAS J. RANKIN #64518  
Deputy County Attorney

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

VERIFICATION

STATE OF ARIZONA            )  
  ) ss.  
COUNTY OF PIMA            )

THOMAS J. RANKIN, being duly sworn, upon oath deposes and says:

1.       He is the Attorney for the State of Arizona in this action.

2.       He makes this Verification for and on behalf of the State in this action, being acquainted with the facts.

3.       He has read the foregoing Complaint and Appendices and knows the contents thereof. Each of the allegations made therein is true upon information and belief.

\_\_\_\_\_  
THOMAS J. RANKIN #64518

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_ day of October, 2004.

\_\_\_\_\_  
Notary Public

My Commission Expires:

\_\_\_\_\_

**PIMA COUNTY ATTORNEY**

32 North Stone

14th Floor

Tucson, AZ 85701

520-740-5600

**APPENDIX ONE**

**1. THE BUSINESS MILLENIUM MOTORS, LLC, INCLUDING ALL PROPERTY AND RIGHTS, TITLES, INTERESTS AND SECURITY IN PROPERTY OF MILLENIUM MOTORS, LLC. AND ITS OWNERS AND OFFICERS, ANY PROCEEDS THEREOF, AND, IN THE EVENT THAT PROPERTY OF MILLENIUM MOTORS, LLC., HAS BEEN MADE OR IS MADE UNAVAILABLE FOR FORFEITURE, ANY SUBSTITUTE ASSETS OF MILLENIUM MOTORS, LLC., AND ITS OWNERS AND OFFICERS.**

**2. REAL PROPERTY OF MILLENIUM MOTORS SEIZED**

REAL PROPERTY LOCATED AT 4101 E. SPEEDWAY BL (TUC), E120' OF W1387' OF N125' OF S175' OF SW4 S .34 AC SEC 3-14-14, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET 11745 AT PAGE 4223, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND APPURTENANCES THERETO

**3. VEHICLES ACTUALLY SEIZED FROM MILLENIUM MOTORS LLC.**

(A) 2002 MAZDA MIATA

VIN: JM1NB353120224546

(B) 2000 TOYOTA 4RUNNER

VIN: JT3HN86R4Y0277839

(C) 2001 NISSAN FRONTIER

VIN: 1N6ED27T21C377092

(D) 1999 JEEP GRAND CHEROKEE

VIN: 1J4GW58N6XC706242

(E) 2000 HONDA 4DSW

VIN: JHLRD1845YC029385

(F) 2000 CHEVROLET SUBURBAN

VIN: 3GNEC16T1YG186134

(G) 2002 BUICK 4DSW

VIN: 3G5DA03E22S508947

(H) 2000 ISUZU TROOPER

VIN: JACDJ58X7Y7J06038

(I) 1999 FORD F-150

VIN: 1FTRX18L7XKB08069



**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

- 1
- 2 (J) 2000 FORD EXPEDITION
- 3 VIN: 1FMRU1666YLB76148
- 4
- 5 (K) 2002 DODGE P/U
- 6 VIN: 1D7HA18N32J237977
- 7
- 8 (L) 2000 JEEP GRAND CHEROKEE
- 9 VIN: 1J4G248S6YC326749
- 10
- 11 (M) 2002 NISSAN PATHFINDER
- 12 VIN: JN8DR09X52W655489
- 13
- 14 (N) 2000 NISSAN PATHFINDER
- 15 VIN: JN8AR07S9YW441799
- 16
- 17 (O) 2001 FORD MUSTANG
- 18 VIN: 1FAFP40401F136746
- 19
- 20 (P) 1999 HONDA CIVIC
- 21 VIN: 2HGEJ6673XH533820
- 22
- 23 (Q) 2002 MITSUBISHI GALANT
- 24 VIN: 4A3AA46G92E126518
- 25
- 26 (R) 2002 MAZDA PROTÉGÉ
- 27 VIN: JM1BJ225320639633
- 28
- 29 (S) 2002 HONDA ACCORD
- 30 VIN: 1HGCG5678YA047360
- 31
- 32 (T) 2001 TOYOTA CAMRY
- 33 VIN: 4T1BG22K91U035799
- 34
- 35 (U) 2003 TOYOTA CAMRY
- 36 VIN: 4T1BE32K83U190598
- 37
- 38 (V) 2001 ISUZU RODEO
- 39 VIN: 4S2CK58W514322256
- 40
- 41 (W) 2001 SATURN 4DSD
- 42 VIN: 1G8ZH52851Z219348
- 43
- 44 (X) 2000 CHEVROLET PRISM
- 45 VIN: 1YLSK5286YZ406936
- 46
- 47 (Y) 2001 INFINITI SUV

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

VIN: JNRDR07Y01W106093

(Z) 2002 HONDA ACCORD

VIN: JHMC G56642C028837

(AA) 2004 DODGE DURANGO

VIN: 1B4HS58N72F168984

(BB) 2000 NISSAN P/U

VIN: 1N6DD21S2YC346298

(CC) 2001 MAZDA VAN

VIN: JM3LW28Y410174714

**4. VEHICLES CONSTRUCTIVELY SEIZED FROM MILLENIUM MOTORS, LLC.**

(A) 1999 FORD EXPEDITION

VIN: 1FMPU18L1XLB85915

(B) 2003 FORD ZX2 CP

VIN: 3FAFP11333R131549

(C) 2003 DODGE NEON

VIN: 1B3ES26C03D157099

(D) 1999 HONDA CIVIC

VIN: 1HGEJ7229XL093749

(E) 2002 MITSUBISHI ECLIPSE

VIN: 4A3AC34G72E003758

(F) 2001 BMW 5CI

VIN: WBABS33491JY55484

(G) 2001 NISSAN ALTIMA

VIN: 1N4DL01D81C119561

(H) 2003 NISSAN FRONTIER

VIN: 1N6ED27T83C450971

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

(I) 2001 INFINITI SUV  
VIN: JNRDR07Y01W106093

(J) FORD EXCURSION  
VIN: 1FMNU42S2YEA01810

**5. PERSONAL/BUSINESS PROPERTY CONSTRUCTIVELY SEIZED  
FROM MILLENIUM MOTORS, LLC.**

(A) FUNDS REPRESENTING THE CASH BOND IN THE AMOUNT OF \$100,000.00  
POSTED IN PIMA COUNTY SUPERIOR COURT CAUSE NUMBER CR-20042912, STATE  
V. MARK ALLEN BEGURSKI, ON AUGUST 14, 2004, USING CASHIERS CHECK  
NUMBER 0615202979, CURRENTLY ON DEPOSIT WITH AND BEING HELD IN THE  
CONSTRUCTIVE TRUST AND POSSESSION OF THE CLERK OF SUPERIOR COURT.

**6. THE BUSINESS MIH REAL ESTATE INVESTORS, INC., INCLUDING ALL  
PROPERTY AND RIGHTS, TITLES, INTERESTS AND SECURITY IN PROPERTY OF  
MIH REAL ESTATE INVESTORS, INC., AND ITS OWNERS AND OFFICERS, ANY  
PROCEEDS THEREOF, AND, IN THE EVENT THAT PROPERTY OF MIH REAL  
ESTATE INVESTORS, INC., HAS BEEN MADE UNAVAILABLE FOR FORFEITURE,  
ANY SUBSTITUTE ASSETS OF MIH REAL ESTATE INVESTORS, INC., AND ITS  
OWNERS AND OFFICERS.**

**7. REAL PROPERTY CONSTRUCTIVELY SEIZED  
FROM MIH REAL ESTATE INVESTORS, INC.**

(A) ONE RESIDENCE LOCATED AT 207 N. SIERRA VISTA DR (TUC), CATALINA  
VISTA LOT 16 BLK H, RECORDED IN THE OFFICE OF THE PIMA COUNTY  
RECORDER IN DOCKET 12055, PAGE 423, INCLUDING ALL BUILDINGS, FIXTURES,  
STRUCTURES AND APPURTENANCES THERETO

(B) ONE RESIDENCE LOCATED AT 4420 W. HOLLADAY ST (PC), LOT 20 EXC W110'  
3.35 AC SEC 6-15-13, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER  
IN DOCKET 12083, PAGE 4479, INCLUDING ALL BUILDINGS, FIXTURES,  
STRUCTURES AND APPURTENANCES THERETO

(C) ONE RESIDENCE LOCATED AT 5722 E. PLACITA LAGRACIAS (PC), ALTA VISTA  
LOT 2, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET  
11331, PAGE 606, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
APPURTENANCES THERETO

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

**8. VEHICLES CONSTRUCTIVELY SEIZED FROM  
MIH REAL ESTATE INVESTORS, INC./CHRISTOPHER SISNEROS**

(A) 2004 BLACK LEXUS 4DSD  
VIN JTHBN36F840150143  
AZ LIC. 301NPE

**9. REAL PROPERTY CONSTRUCTIVELY SEIZED  
DURING INVESTIGATION**

(A) ONE RESIDENCE LOCATED AT 256 W. OKLAHOMA ST (TUC),  
NATIONAL CITY NO 5 LOT 12 EXC N7.5' FOR ALLEY BLK 75, RECORDED IN THE  
OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET 11202, PAGE 2183,  
INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND APPURTENANCES  
THERETO

(B) ONE RESIDENCE LOCATED AT 3351 S. PLACITA COSTA RICA (TUC), KENNEDY  
PARK NO 2 TOWNHOUSES LOT 56 RESUB KENNEDY PARK NO 2 LOTS 1-101 SEC 27-  
14-13, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET  
9029 AT PAGE 779, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
APPURTENANCES THERETO

(C) ONE RESIDENCE LOCATED AT 275 N. SIERRA VISTA DR (TUC), CATALINA  
VISTA LOT 19 EXC N20' BLK N, RECORDED IN THE OFFICE OF THE PIMA COUNTY  
RECORDER IN DOCKET 8129 AT PAGE 1853, INCLUDING ALL BUILDINGS,  
FIXTURES, STRUCTURES AND APPURTENANCES THERETO

(D) ONE RESIDENCE LOCATED AT 2619 S. JAGUAR RD. (TUC), LAKESIDE NO 5 LOT  
54, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET 8256  
AT PAGE 1856, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
APPURTENANCES THERETO

(E) ONE RESIDENCE LOCATED AT 3451 W. FOXES MEADOW DR. (TUC), FOX  
HIDEAWAY LOT 0023, RECORDED IN THE OFFICE OF THE PIMA COUNTY  
RECORDER IN DOCKET 12173 AT PAGE 3621, INCLUDING ALL BUILDINGS,  
FIXTURES, STRUCTURES AND APPURTENANCES THERETO

(F) ONE RESIDENCE LOCATED AT 713 N. SAN RAFAEL AV (TUC), SANTA MARIA  
LOT 17, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET  
11797 AT PAGE 1827, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
APPURTENANCES THERETO

(G) ONE RESIDENCE LOCATED AT 5602 E. NORTH WILSHIRE DR. (TUC), WILSHIRE  
HEIGHTS AMENDED LOT 1 BLK 8, RECORDED IN THE OFFICE OF THE PIMA  
COUNTY RECORDER IN DOCKET 12158 AT PAGE 4303, INCLUDING ALL BUILDINGS,  
FIXTURES, STRUCTURES AND APPURTENANCES THERETO

ONE RESIDENCE LOCATED AT 1302 W. YAVAPAI ST. (TUC), EL RIO ACRES E 50' OF

**PIMA COUNTY ATTORNEY**

32 North Stone

14th Floor

Tucson, AZ 85701

520-740-5600

1 L 109, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET  
2 11331 AT PAGE 1482, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
3 APPURTENANCES THERETO  
4

5 (H) ONE RESIDENCE LOCATED AT 1712 W. LAVENDER MOUNTAIN PL (TUC),  
6 MIDVALE TERRACE II LOT 0036, RECORDED IN THE OFFICE OF THE PIMA COUNTY  
7 RECORDER IN DOCKET 12044 AT PAGE 7181, INCLUDING ALL BUILDINGS,  
8 FIXTURES, STRUCTURES AND APPURTENANCES THERETO  
9

10 (I) ONE RESIDENCE LOCATED AT 1616 W. TRENDWOOD DR. (TUC), OAK TREE II AT  
11 MIDVALE LOT 412 (FORMERLY 137-11-6540), RECORDED IN THE OFFICE OF THE  
12 PIMA COUNTY RECORDER IN DOCKET 10732 AT PAGE 1836, INCLUDING ALL  
13 BUILDINGS, FIXTURES, STRUCTURES AND APPURTENANCES THERETO  
14  
15

16 (J) ONE RESIDENCE LOCATED AT 840 N. WINDBELL CI (PC), SMOKETREE ESTATES  
17 LOT 12, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET  
18 12117, PAGE 8753, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
19 APPURTENANCES THERETO  
20

21 (K) ONE RESIDENCE LOCATED AT 3781 W. EL MORAGA PL (PC), RANCHO EL  
22 MORAGA (AMENDED) LOT 16 EXC RD, RECORDED IN THE OFFICE OF THE PIMA  
23 COUNTY RECORDER IN DOCKET 12162, PAGE 2394, INCLUDING ALL BUILDINGS,  
24 FIXTURES, STRUCTURES AND APPURTENANCES THERETO  
25

26 (L) ONE RESIDENCE LOCATED AT 2478 N. QUESNEL LP (TUC), SONORAN PLACE  
27 LOT 0031, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN  
28 DOCKET 10450, PAGE 1283, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES  
29 AND APPURTENANCES THERETO  
30

31 (M) ONE RESIDENCE LOCATED AT 9201 E. CREEK ST (TUC), HEARTHSTONE HILLS  
32 NO 4 LOT 67, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN  
33 DOCKET 12211, PAGE 972, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES  
34 AND APPURTENANCES THERETO  
35

36 (N) ONE RESIDENCE LOCATED AT 6700 W. CALLE DE MI JAZMIN (PC), E273'  
37 W859.95' S653.89' N657.89' W586.95' S2' N6' & E2' W861.95' S327.05' S2 NE4 SW4 4.14 AC  
38 SEC 3-13-12, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN  
39 DOCKET 12177, PAGE 4078, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES  
40 AND APPURTENANCES THERETO  
41

**PIMA COUNTY ATTORNEY**

32 North Stone

14th Floor

Tucson, AZ 85701

520-740-5600

1 (O) ONE RESIDENCE LOCATED AT 5901 E. CALLE SILVOSA (TUC), GOLF LINKS LOT  
2 25, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET 11549  
3 AT PAGE 1752, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
4 APPURTENANCES THERETO  
5

6 (P) ONE RESIDENCE LOCATED AT 9941 W, MERCURY DR (PC), SAN JOAQUIN  
7 ESTATES LOT 168, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN  
8 DOCKET 11816 AT PAGE 1003, INCLUDING ALL BUILDINGS, FIXTURES,  
9 STRUCTURES AND APPURTENANCES THERETO  
10

11 (Q) ONE RESIDENCE LOCATED AT 16900 S LA VILLITA RD (SAH), IRR PTN N231.19'  
12 W594.52' E324.52' NE4 NW4 3 AC SEC 24-17-13, RECORDED IN THE OFFICE OF THE  
13 PIMA COUNTY RECORDER IN DOCKET 10246 AT PAGE 1227, INCLUDING ALL  
14 BUILDINGS, FIXTURES, STRUCTURES AND APPURTENANCES THERETO  
15

16 (R) ONE RESIDENCE LOCATED AT 6885 E. CAMINO DEL DORADO (TUC), EL  
17 DORADO TOWNHOMES LOT 46, RECORDED IN THE OFFICE OF THE PIMA COUNTY  
18 RECORDER IN DOCKET 12135 AT PAGE 5092, INCLUDING ALL BUILDINGS,  
19 FIXTURES, STRUCTURES AND APPURTENANCES THERETO  
20

21 (S) ONE RESIDENCE LOCATED AT 3851 W WILD LIFE PL (PC), PARK VIEW ESTATES  
22 LOT 7, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET  
23 11621 AT PAGE 1926, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
24 APPURTENANCES THERETO  
25

26 (T) ONE RESIDENCE LOCATED AT 5525 E COPPER ST (TUC), CARLOS TERRACE  
27 LOT 100 (10235/623) (10737/2258), RECORDED IN THE OFFICE OF THE PIMA COUNTY  
28 RECORDER IN DOCKET 9473 AT PAGE 1293, INCLUDING ALL BUILDINGS,  
29 FIXTURES, STRUCTURES AND APPURTENANCES THERETO  
30

31 (U) ONE RESIDENCE LOCATED AT 5618 S FORREST AV (PC), GARDEN CITY LOT 8  
32 BLK G, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER IN DOCKET  
33 12100 AT PAGE 89, INCLUDING ALL BUILDINGS, FIXTURES, STRUCTURES AND  
34 APPURTENANCES THERETO  
35

36 (V) ONE RESIDENCE LOCATED AT 1110 E GRANT RD (TUC), MONTEREY AMENDED  
37 LOT 8 & W2 OF LOT 7 EXC N15' THEREOF BLK 41, RECORDED IN THE OFFICE OF  
38 THE PIMA COUNTY RECORDER IN DOCKET 12125 AT PAGE 5628, INCLUDING ALL  
39 BUILDINGS, FIXTURES, STRUCTURES AND APPURTENANCES THERETO  
40

41 (W) ONE RESIDENCE LOCATED AT 9436 E SIERRA AV (TUC), HARRISON ESTATES  
42 AMENDED LOT 16, RECORDED IN THE OFFICE OF THE PIMA COUNTY RECORDER  
43 IN DOCKET 12190 AT PAGE 1318, INCLUDING ALL BUILDINGS, FIXTURES,  
44 STRUCTURES AND APPURTENANCES THERETO  
45

**PIMA COUNTY ATTORNEY**

32 North Stone

14th Floor

Tucson, AZ 85701

520-740-5600

**10. VEHICLES ACTUALLY SEIZED DURING  
INVESTIGATION SEARCH WARRANTS**

(A) 1988 JAGUAR 4DSD  
VIN: SAJKVA642JC522561  
AZ LIC: 612KPH

(B) 2003 JEEP  
VIN: 1J4GK38K83W550137  
AZ LIC: 074NTG

(C) 1996 CHEVROLET  
VIN: 1G1JC1249T7199958  
AZ LIC: 849MTN

(D) 2003 HONDA ATV  
VIN: 478TE24453A310756  
AZ LIC: 2DKFRV

(E) 2001 FORD  
VIN. 1FTRW08L91KA21987  
AZ LIC. 526GLA

(F) 1997 CHEVROLET  
VIN. 3GNFK16R3VG103987  
AZ LIC. 879LJW

(G) 1995 FORD  
VIN. 1FTEX15H9SKA29381  
AZ LIC. D2L855

(H) 2002 FORD  
VIN. 1FMPU16L02LA26007  
AZ LIC. 578BYV

(I) 2000 JEEP  
VIN. 1J4GW48S8YC139355  
AZ LIC. MGH535

(J) 1999 NISSAN  
VIN. 1N4DL01DXX212378  
AZ LIC. 676LAN

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 (K) 1996 CHEVROLET  
2 VIN: 3GCEC28K3TG132720  
3 MEXICO LIC: DYP2037  
4

5 (L) 1993 TOYOTA  
6 VIN. JT2EL4651P0272699  
7 AZ LIC. 392NKE  
8

9 **11. VEHICLES CONSTRUCTIVELY SEIZED PURSUANT TO INVESTIGATION**  
10

11 (A) 2003 TOYOTA  
12 VIN: JTEHT05JX32034270  
13 LIC: D2C352  
14

15 (B) 2002 GMC  
16 VIN: 1GKEC13Z12R180945  
17 LIC: 877MYV  
18

19 (C) 1994 FORD  
20 VIN: 1FALP4445RF167418  
21 AZ LIC: 611KPH  
22

23 (D) 2000 FORD  
24 VIN: 1FAFP44431F112905  
25 AZ LIC.: 207NGY  
26

27 (E) 2000 KIA  
28 VIN. KNAFB1215Y5822580  
29 AZ LIC. 376NPE  
30

31 (F) 1988 CHEVROLET  
32 VIN: 1G1AW51W2J6247238  
33 AZ LIC: NBY138  
34

35 (G) 1994 FORD  
36 VIN. IFTEF14N5RLA44295  
37 AZ LIC. S235463  
38

39 (H) 2000 FORD  
40 VIN. 1FAFP5521YG140502  
41 AZ LIC.090MZE  
42

43 (I) 1996 TOYOTA  
44 VIN. JT2BG12K3T0340569  
45 AZ LIC. M0590  
46

47 (J) 1996 FORD



**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

VIN. 2FMDA5145TBA91620

AZ LIC. D2L802

**12. PERSONAL PROPERTY ACTUALLY SEIZED DURING INVESTIGATION**

(A) U.S. CURRENCY IN THE AMOUNT OF \$127,005.00

(B) COMPUTER MONITOR AND FIVE (5) COMPUTER TOWERS

(C) THIRTY-EIGHT (38) CELL PHONES

(D) SIXTEEN (16) CELL PHONE CHARGERS

(E) FIVE (5) DIGITAL SCALES

(F) TWO (2) PLATINUM RINGS W/DIAMONDS

(G) ONE (1) WATCH W/DIAMONDS, 14 KT GOLD

(H) ONE (1) PLATINUM CROSS AND NECKLACE

(I) 9MM HANDGUN W/MAGAZINE, S/N 1382618

(J) BROWNING 9MM, S/N 24NX52322

(K) FIRESTORM .38 CAL., S/N 71-04-01220-04

(L) REMINGTON 870, S/N D287255M

(M) UNIVERSAL 30 CAL., S/N 61149

(N) RIFLE, S/N 1386112

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

**APPENDIX TWO**

**INTERESTED PARTIES**

- (A) MILLENIUM MOTORS LLC  
4101 E. SPEEDWAY BLVD.  
TUCSON, AZ 85712
- (B) WILLIAM JESTER  
WELLS FARGO AUTO FINANCE  
1225 E. WESLEYAN  
TEMPE, AZ 85282
- (C) MICHAEL JOHN GERDES  
NISSAN INFINITI LT  
8404 S. KACHINA  
TEMPE, AZ 85284
- (D) TERRY JOE HALL  
WELLS FARGO AUTO FINANCE  
1864 S. YUCCA  
MESA, AZ 85202
- (E) WELLS FARGO AUTO FINANCE  
P O BOX 11983  
SANTA ANA, CA 92711-1983
- (F) RUBEN ANTONIO VALENCIA  
BANCAMERICA AUTO FINANCE CORP.  
746 N. LINDA VISTA DR.  
NOGALES, AZ 85621
- (G) LOURDES VALENCIA  
BANCAMERICA AUTO FINANCE CORP.  
746 N. LINDA VISTA DR.  
NOGALES, AZ 85621
- (H) RICKY M. NELSON  
12900 E. CAMINO ANCHO  
TUCSON, AZ 85749
- (I) KIM L. NELSON  
12900 E. CAMINO ANCHO  
TUCSON, AZ 85749

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

- 1 (J) GMC VAULT TRUST  
2 P O BOX 29035  
3 PHOENIX, AZ  
4  
5 (K) SANDS USED CARS-TRUCKS INC.  
6 1133 W. BELL ROAD  
7 PHOENIX, AZ 85023  
8  
9 (L) DONALD A. HALEY  
10 BANK ONE ARIZONA NA  
11 2606 N. 112<sup>TH</sup> LANE  
12 AVONDALE, AZ 85323  
13  
14 (M) BARBARA G. HALEY  
15 BANK ONE ARIZONA NA  
16 2606 N. 112<sup>TH</sup> LANE  
17 AVONDALE, AZ 85323  
18  
19 (N) LEO PATRICK HOLTORF  
20 20691 N. 56<sup>TH</sup> AVENUE  
21 GLENDALE, AZ 85308  
22  
23 (O) DEBRA LOVELLA HOLTORF  
24 20691 N. 56<sup>TH</sup> AVENUE  
25 GLENDALE, AZ 85308  
26  
27 (P) BANCAMERICA AUTO FINANCE  
28 P O BOX 2269  
29 BREA, CA 92822-2269  
30  
31 (Q) MELISSA LOU ALLEN  
32 4905 E. ANNETTE DRIVE  
33 SCOTTSDALE, AZ 85254  
34  
35 (R) M&I MARSHAL & IISLEY BANK  
36 P O BOX 2076  
37 MILWAUKEE, WI 53201-2076  
38  
39 (S) SALVATORE SAM BENIGNO  
40 14440 S. 24<sup>TH</sup> PLACE  
41 PHOENIX, AZ 85044  
42  
43 (T) NISSAN INFINIT TRUST  
44 2901 KINWEST PARKWAY  
45 IRVING, TX 75063-3134  
46  
47

**PIMA COUNTY ATTORNEY**

32 North Stone

14th Floor

Tucson, AZ 85701

520-740-5600

- 1 (U) MICHAEL STANLEY BROWN  
2 2065 E. LA DONNA  
3 TEMPE, AZ 85283  
4
- 5 (V) CLAUDIA RAE BROWN  
6 2065 E. LA DONNA  
7 TEMPE, AZ 85283  
8
- 9 (W) CRYSTAL ANN BURNETT  
10 4415 W. TIERRA BUENA LANE  
11 GLENDALE, AZ 85306  
12
- 13 (X) AMTRUST BANK  
14 6900 E. CAMELBACK #215  
15 SCOTTSDALE, AZ 85251-8049  
16
- 17 (Y) LOUIS BERGER  
18 26426 TRURO DRIVE  
19 SUN LAKES, AZ 85248  
20
- 21 (Z) DANIEL L. KELLER  
22 26426 TRURO DRIVE  
23 SUN LAKES, AZ 85248  
24
- 25 (AA) MARLENE FAYE REISWIG  
26 8026 E. INVERNESS AVENUE  
27 MESA, AZ 85208  
28
- 29 (BB) MMCA  
30 P O BOX 6014  
31 CYPRESS, CA 90630-0014  
32
- 33 (CC) BELL ROAD TOYOTA  
34 2020 W. BELL ROAD  
35 PHOENIX, AZ 85023  
36
- 37 (DD) ALETHEA MARIE PETERS  
38 7826 W. HEARN ROAD  
39 PEORIA, AZ 85381  
40
- 41 (EE) PAUL JAMES WATSON  
42 11118 W. FLORIDA AVENUE  
43 YOUNGTOWN, AZ 85363  
44
- 45 (FF) ELEESHA CARA BROWN  
46 11118 W. FLORIDA AVENUE  
47 YOUNGTOWN, AZ 85363

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1  
2 (GG) JAMES J. GROVE  
3 5901 W. BEHREND DRIVE  
4 GLENDALE, AZ 85308  
5  
6 (HH) CAROL L. MANGIAMELI  
7 5901 W. BEHREND DRIVE  
8 GLENDALE, AZ 85308  
9  
10 (II) ISUZU LT  
11 999 NW GRAND BLVD, STE 600  
12 OKLAHOMA CITY, OK 73118-6115  
13  
14 (JJ) GENERAL MOTORS ACCEPTANCE CORP  
15 P O BOX 8103  
16 COCKEYSVILLE, MD 21030  
17  
18 (KK) PETER STEPHAN ZORILLA  
19 DEBIS FINANCIAL SERVICES  
20 10735 N. ROCKY SLOPE DRIVE  
21 TUCSON, AZ 85737  
22  
23 (LL) UNVERIFIED LIENHOLDER  
24 1801 W. JEFFERSON MD 539M  
25 PHOENIX, AZ 85007  
26  
27 (MM) DANIEL FRANCIS FOLEY  
28 1819 W. MOUNTAIN LAUREL DR.  
29 ORO VALLEY, AZ 85737  
30  
31 (NN) AMERICREDIT FINANCIAL SERVICES  
32 P O BOX 182673  
33 ARLINGTON, TX 76096  
34  
35 (OO) LOUISE WEBSTER  
36 3030 S. ALMA SCHOOL RD. #2  
37 MESA, AZ 85210  
38  
39 (PP) PAUL WEBSTER  
40 3030 S. ALMA SCHOOL RD. #2  
41 MESA, AZ 85210  
42  
43 (QQ) FLAGSHIP CREDIT CORP.  
44 P O BOX 250  
45 ESSINGTON, PA 19029-0250  
46  
47

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 (RR) EVAN PHILLIP POMERANTZ  
2 3280 W. SHANNON PLACE  
3 CHANDLER, AZ 85226  
4  
5 (SS) KATHRINE ANN POMERANTZ  
6 3280 W. SHANNON PLACE  
7 CHANDLER, AZ 85226  
8  
9 (TT) MAZDA AMERICAN CREDIT  
10 P O BOX 680030  
11 FRANKLIN, TN 37068-0030  
12  
13 (UU) NORMA YOLANDA PADILLA  
14 256 W. OKLAHOMA  
15 TUCSON, AZ 85714  
16  
17 (VV) RICARDO H. VARELA  
18 1616 W. TRENDWOOD  
19 TUCSON, AZ 85746  
20  
21 (WW) AMERICAN HONDA FINANCE CO.  
22 1235 OLD ALPHARETTA RD #1  
23 ALPHARETTA, GA 30005-2907  
24  
25 (XX) JORGE L. GARCIA  
26 1616 W. TRENDWOOD  
27 TUCSON, AZ 85746  
28  
29 (YY) FORD MOTOR CREDIT  
30 P O BOX 105704  
31 ATLANTA, GA 30348-5704  
32  
33 (ZZ) SANTIAGO B. RAMIREZ  
34 1302 W. YAVAPAI STREET  
35 TUCSON, AZ 85745  
36  
37 (A3) MARJAVA CECILIA RAMIREZ  
38 1302 W. YAVAPAI STREET  
39 TUCSON, AZ 85745  
40  
41 (B3) ANNETTE HERNANDEZ ISLAS  
42 1800 W. WHITE OAK CT.  
43 TUCSON, AZ 85746  
44  
45 (C3) DM FEDERAL CREDIT UNION  
46 P O BOX 15115  
47 TUCSON, AZ 85708-0115

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

- 1  
2 (D3) PATRICIA NADINE VAUGHN  
3 2300 W. CALLE ENCANTO  
4 ORACLE, AZ 85623  
5  
6 (E3) FRANK EUGENE TORRES, JR.  
7 2300 W. CALLE ENCANTO  
8 ORACLE, AZ 85623  
9  
10 (F3) ALFREDO FELIX PARRA  
11 3985 N. STONE #285  
12 TUCSON, AZ 85705  
13  
14 (G3) JOSEPH VITO DE AUGUSTA  
15 7213 W. SUMMIT TRIAL STREET  
16 MESA, AZ 85207-7160  
17  
18 (H3) MARJORIE ELAINE STERN-DE AUGUSTA  
19 7213 W. SUMMIT TRIAL STREET  
20 MESA, AZ 85207-7160  
21  
22 (I3) WELL FARGO AUTO FINANCE INC.  
23 711 W. BROADWAY  
24 TEMPE, AZ 85282-1278  
25  
26 (J3) WELLS FARGO FINANCIAL ACCEPTANCE  
27 1 INTERNATIONAL PLAZA #3  
28 PHILADELPHIA, PA 19113  
29  
30 (K3) DANA HEATHER ABUGOW  
31 3532 E. TRIGGER WAY  
32 GILBERT, AZ 85297  
33  
34 (L3) ERIN NICOLE CORBETT  
35 6001 E. PIMA STREET #201  
36 TUCSON, AZ 85712  
37  
38  
39 (M3) PICERNE CONSTRUCTION CORP.  
40 1420 E. MISSOURI AVENUE #100  
41 PHOENIX, AZ 85014  
42  
43 (N3) PATRICIA A. SMITH  
44 2801 W. SHERYL DRIVE  
45 TUCSON, AZ 85713  
46  
47

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

- 1 (O3) PETER STEPHEN ZORILLA  
2 10735 N. ROCKY SLOPE DRIVE  
3 TUCSON, AZ 85737  
4  
5 (P3) DEBIS FINANCIAL SERVICES  
6 P O BOX 60070  
7 PHOENIX, AZ 85082-0070  
8  
9 (Q3) JESUS ALBERTO LEON  
10 3451 W. FOXES MEADOW DRIVE  
11 TUCSON, AZ 85745  
12  
13 (R3) COLIN F. JONAS  
14 3625 E. RAY ROAD #2080  
15 PHOENIX, AZ 85044  
16  
17 (S3) VIRGINIA LYNNE JONAS  
18 3625 E. RAY ROAD #2080  
19 PHOENIX, AZ 85044  
20  
21 (T3) BHFC  
22 P O BOX 37529  
23 PHOENIX, AZ 85044  
24  
25 (U3) CHRISTOPHER M. NERO  
26 840 N. WINDBELL CIRCLE  
27 TUCSON, AZ 85745  
28  
29 (V3) LUIS C. PADILLA  
30 256 W. OKLAHOMA  
31 TUCSON, AZ 85714  
32  
33 (W3) JIMMIE D. HOLLAND  
34 1750 W. DEACON DRIVE  
35 TUCSON, AZ 85746  
36  
37  
38 (X3) ALAN R. ANDERSON  
39 275 N. SIERRA VISTA DRIVE  
40 TUCSON, AZ 85719  
41  
42 (Y3) TOM E. ZEIER  
43 2619 S. JAGUAR ROAD  
44 TUCSON, AZ 85730  
45  
46  
47



**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1	(Z3)	RODNEY ARNOKOVICH
2		3451 W. FOXES MEADOW DRIVE
3		TUCSON, AZ 85745
4		
5	(A4)	RUBEN SUAREZ
6		713 N. SAN RAFAEL AVENUE
7		TUCSON, AZ 85745
8		
9	(B4)	MARTHA SUAREZ
10		713 N. SAN RAFAEL AVENUE
11		TUCSON, AZ 85745
12		
13	(C4)	DANIEL A. DOMINGUEZ
14		5602 E. NORTH WILSHIRE DRIVE
15		TUCSON, AZ 85711
16		
17	(D4)	ROBERT H. PEREZ
18		5602 E. NORTH WILSHIRE DRIVE
19		TUCSON, AZ 85711
20		
21	(E4)	SANTIAGO RAMIREZ
22		1538 N. YAVAPAI STREET
23		TUCSON, AZ 85745
24		
25	(F4)	KARLA K. JUAREZ
26		1712 W. LAVENDER MOUNTAIN PLACE
27		TUCSON, AZ 85746
28		
29	(G4)	MONICA AIDE PESQUEIRA
30		1616 W. TRENDWOOD DRIVE
31		TUCSON, AZ 85746
32		
33	(H4)	FRANK M. VALDEZ
34		840 N. WINDBELL CIRCLE
35		TUCSON, AZ 85706
36		
37	(I4)	JANIE FOSTER
38		840 N. WINDBELL CIRCLE
39		TUCSON, AZ 85706
40		
41	(J4)	MIH REAL ESTATE INVESTORS INC.
42		207 N. SIERRA VISTA DRIVE
43		TUCSON, AZ 85716
44		
45	(K4)	RODNEY ARNOKOVICH
46		3781 E. EL MORAGA PLACE
47		TUCSON, AZ 85712

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

- 1
- 2 (L4) GARY T. GUERRERO
- 3 2478 N. QUESNEL LOOP
- 4 TUCSON, AZ 85715
- 5
- 6 (M4) JILL M. MARCOTTE
- 7 9201 E. CREEK STREET
- 8 TUCSON, AZ 85730
- 9
- 10 (N4) LAWRENCE H. ARIAS
- 11 4420 W. HOLLADAY
- 12 TUCSON, AZ 85746
- 13
- 14 (O4) MIH REAL ESTATE INVESTORS INC.
- 15 4420 E. HOLLADAY
- 16 TUCSON, AZ 85746
- 17
- 18 (P4) RODNEY ARNOKOVICH
- 19 6700 W. CALLE DE MI JAZMIN
- 20 TUCSON, AZ 85743-8690
- 21
- 22 (Q4) MIH REAL ESTATE INVESTORS INC.
- 23 5722 E. PLACITA LA GRACIAS
- 24 TUCSON, AZ 85750
- 25
- 26 (R4) JOHN COJANIS
- 27 5525 E. COPPER
- 28 TUCSON, AZ 85712
- 29
- 30 (S4) SALLY ANN COJANIS
- 31 5525 E. COPPER
- 32 TUCSON, AZ 85712
- 33
- 34
- 35 (T4) BRUCE H. RAYMOND
- 36 9941 W. MERCURY
- 37 TUCSON, AZ 85746
- 38
- 39 (U4) ALMA LOURDES HERNANDEZ ALCANTAR
- 40 6885 E. CAMINO DEL DORADO
- 41 TUCSON, AZ 85715
- 42
- 43 (V4) DEED AND NOTE TRADERS
- 44 ATTN: CARLOS BENT
- 45 1302 N. ALVERNON WAY
- 46 TUCSON, AZ 85712-3802
- 47

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 (W4) FRANK VALDEZ  
2 5618 S. FORREST AVENUE  
3 TUCSON, AZ 85746-3041  
4  
5 (X4) JANIE FOSTER-VALDEZ  
6 5618 S. FORREST AVENUE  
7 TUCSON, AZ 85746-3041  
8  
9 (Y4) DANIEL N. MORDECAI  
10 1110 E. GRANT ROAD  
11 TUCSON, AZ 85719-3023  
12  
13 (Z4) CHASE MANHATTAN BANK  
14 ATTN: GREEN POINT MRTG FUNDING INC.  
15 2300 BROOKSTONE CENTRE PARKWAY  
16 COLUMBUS, GA 31904  
17  
18 (A5) MARIA ISABEL DOMINGUEZ  
19 PIMA COUNTY JAIL  
20  
21 (B5) ARTURO CASTILLO JUAREZ  
22 PIMA COUNTY JAIL  
23  
24 (C5) JOSE ADAN MONTOYA-CUADRAS  
25 PIMA COUNTY JAIL  
26  
27 (D5) ROBERT T. MILLER  
28 PIMA COUNTY JAIL  
29  
30 (E5) RENE ANTONIO FRAGOSO  
31 PIMA COUNTY JAIL  
32  
33 (F5) GARY G. RUSSELL  
34 PIMA COUNTY JAIL  
35  
36 (G5) MIGUEL ANGEL FRAGOSO  
37 PIMA COUNTY JAIL  
38  
39 (H5) ANGELA CAROL JACKSON  
40 PIMA COUNTY JAIL  
41  
42 (I5) VICENTE MURRIETA MELENDEZ  
43 PIMA COUNTY JAIL  
44  
45 (J5) ALFREDO FELIX PARRA  
46 PIMA COUNTY JAIL  
47

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 (K5) LUIS ORLANDO OSUNA-LUGO  
2 PIMA COUNTY JAIL  
3  
4 (L5) OSCAR SOSA-HERNANDEZ  
5 PIMA COUNTY JAIL  
6  
7 (M5) DAVID SOSA-HERNANDEZ  
8 PIMA COUNTY JAIL  
9  
10 (N5) FREDERICK JEROME LEWIS  
11 PIMA COUNTY JAIL  
12  
13 (O5) MARCUS ANTHONY MARAGH  
14 PIMA COUNTY JAIL  
15  
16 (P5) CHRISTOPHER KARL SISNEROS  
17 9201 E. CREEK  
18 TUCSON, AZ 85730  
19  
20 (Q5) CHRISTOPHER KARL SISNEROS  
21 840 N. WINDBELL CIRCLE  
22 TUCSON, AZ 85745-9671  
23  
24 (R5) MARK A. BEGURSKI  
25 9850 E. BANBRIDGE STREET  
26 TUCSON, AZ 85747  
27  
28 (S5) HECTOR ALFONSO MONTOYA  
29 1964 N. CORAL BELLS DRIVE  
30 TUCSON, AZ 85745-5219  
31  
32 (T5) PATRICIA MENDOZA  
33 5551 S. GREENWAY  
34 TUCSON, AZ 85706-2627  
35  
36 (U5) HOPETON ANTHONY MCZENNA  
37 3420 E. GLINTON AVENUE EAST #301  
38 SCARBOROUGH, ONTARIO, CANADA  
39  
40 (V5) GLORIA E. ARMENTA  
41 713 N. SAN RAFAEL DRIVE  
42 TUCSON, AZ 85745-2260  
43  
44 (W5) ROSARIO ELENA DIAZ FELIX  
45 120 E. DELANO  
46 TUCSON, AZ 85705-3904  
47

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 (X5) SONIA GUADALUPE CRUZ-GARCIA  
2 1114 E. 35<sup>TH</sup> STREET  
3 TUCSON, AZ 85713-3732  
4

5 (Y5) RICARDO H. VARELA  
6 1616 W. TRENDWOOD  
7 TUCSON, AZ 85746-1339  
8

9 (Z5) CESAR MORENO  
10 9310 E. MAIN STREET  
11 PHOENIX, AZ  
12

13 (A6) LINCOLN CLIVE DAWKINS  
14 1370 E. 23<sup>RD</sup> #1C  
15 BROOKLYN, NY 11210-5113  
16

17 (B6) CHERYL ANN LATOSKI  
18 8E ENIGHED  
19 CRUZ BAY, ST. JOHNS  
20 US VIRGIN ISLANDS

21 (C6) CASIN ANN MCLEAN  
22 9111 CHURCH AVENUE #7H  
23 BROOKLYN, NY 11236-1043  
24

25 (D6) SANTIAGO BESERRA RAMIREZ  
26 1302 W. YAVAPI  
27 TUCSON, AZ 85745-2055  
28

29 (E6) CHARLES KEITH  
30 107-30 PRINCETON STREET  
31 QUEENS, NY  
32

33 (F6) RAYMUNDO RODRIGUEZ-CRUZ  
34 ROCR 5906049X4 AVE. #704  
35 OAXACA, MEXICO  
36

37 (G6) RAYMUNDO RODRIGUEZ-CRUZ  
38 120 E. DELANO  
39 TUCSON, AZ 85705-3904  
40

41 (H6) JOAQUIN FELIX DOMINGUEZ  
42 PRIV E LOS REYES #50  
43 COLONIA PALO VERDE  
44 HERMOSILLO, SONORA, MEXICO  
45  
46  
47

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

- 1 (I6) JOAQUIN FELIX DOMINGUEZ  
2 275 N. SIERRA VISTA  
3 TUCSON, AZ 85719-3844  
4
- 5 (J6) LAW OFFICE OF MICHAEL L. BROWN  
6 3060 N. SWAN ROAD, SUITE 150  
7 TUCSON ARIZONA 85712-1225  
8 ATTORNEY FOR CLAIMANT BRUCE RAYMOND  
9
- 10 (K6) GREEN POINTE MORTGAGE FUNDING INC.  
11 ATTN: LEGAL DEPARTMENT  
12 100 WOOD HOLLOW DRIVE  
13 NOVATO CALIFORNIA 94945  
14
- 15 (L6) JEAN MONDEAU  
16 STATUORY AGENT MILLINEUM MOTORS  
17 5234 E. 21ST STREET  
18 TUCSON ARIZONA 85711  
19
- 20 (M6) JAMI STREY  
21 9850 E. BANBRIDGE  
22 TUCSON ARIZONA 85747  
23
- 24 (N6) JOHN KAUFMANN ATTORNEY AT LAW  
25 177 N. CHURCH AVE, SUITE #905  
26 TUCSON ARIZONA 85701  
27 ATTORNEY FOR CLAIMANT JAMI STREY  
28
- 29 (O6) ROY FIFE  
30 2640 E. 8TH STREET  
31 TUCSON ARIZONA 85716  
32
- 33 (P6) JAMES STUEHRINGER  
34 ATTORNEY AT LAW  
35 5210 E. WILLIAMS CIRCLE, SUITE #800  
36 TUCSON ARIZONA 85711  
37 ATTORNEY FOR CLAIMANT RODNEY ARNOKOVICH  
38
- 39 (Q6) ANDREW BRITTON  
40 C\O HUGHES FEDERAL CREDIT UNION  
41 PO BOX 11900  
42 TUCSON ARIZONA 85775  
43  
44  
45  
46  
47

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 (R6) HAROLD HIGGINS  
2 ATTORNEY AT LAW  
3 100 N. STONE AVE #605  
4 TUCSON ARIZONA 85701  
5 ATTORNEY FOR CLAIMANT BEGURSKY  
6

7 (S6) LISA BRENNEN  
8 400 NORTH BECK AVENUE  
9 CHANDLER ARIZONA 85226  
10

11 (T6) RUBEN SUAREZ  
12 101 E. TOUGHNUT STREET  
13 TUCSON ARIZONA 85638  
14

15 (U6) ALAN R. ANDERSON  
16 4918 E. 24TH STREET  
17 TUCSON ARIZONA 85711  
18

19 (V6) ATTORNEY RUDY HALE  
20 1135 WEST FRONTAGE ROAD SUITE C  
21 RIO RICO ARIZONA 85648  
22 ATTORNEY FOR CLAIMANT SANTIAGO AND MARJAVA RAMIREZ  
23

24 (W6) MARK LEHMAN  
25 AUTOMOTIVE FINANCE CORPORATION  
26 13085 HAMILTON CROSSING BLVD, SUITE 300  
27 CARMEL INDIANA 46032  
28

29 (X6) JOSH SILVERMAN  
30 3731 E. GRANT ROAD  
31 TUCSON ARIZONA 85716  
32

**APPENDIX THREE**

**SUMMARY OF FACTS, EVENTS, CONDUCT, AND REASONABLE  
INFERENCES ARISING THEREFROM GIVING RISE TO FORFEITURE**

1. The facts, events, conduct , and reasonable inferences arising therefrom set forth below occurred in Pima County, Arizona, unless noted otherwise.

2. From the late Fall of the year 2003 through the present, law enforcement agents of the Tucson/Pima County Counter-Narcotics Alliance (CNA) conducted an investigation of a large-scale, international and multi-state marijuana importation, distribution and sales and money laundering enterprise. The investigation included surveillance of suspects, information obtained through wire intercept orders, and information obtained through investigation of public and private personal, property and financial records and government criminal history records. Suspects in the investigation included the main suspect, Maria Isabel Dominguez aka Maria Ritson, and other individuals and commercial and professional business entities, including Cheryl Latoski, Miguel Fragoso, Rene Fragoso, Annette Hernandez-Islas, Gloria Armenta, Alfredo Felix Parra, Robert "Tony" Miller, Marcus "Steve" Maragh, Raymundo Rodriguez-Cruz, Rosario Elena Diaz Felix, Ricardo Varela aka Ricardo Elias-Molina, Gary Russell, Cesar Moreno, Jose Adan Montoya-Cuadras, Luis Orlando Osuna-Lugo, Joaquin Felix Dominguez, Lincoln Clive Dawkins, Patricia Mendoza, Sonia Guadalupe Cruz-Garcia, Charles Keith, Frederick Jerome Lewis, Angela Carol Jackson, Vicente Melendez, Hopeton Anthony McZenna, Oscar Sosa-Hernandez, Marjava Ramirez, Santiago Ramirez, David Luis Sosa-Hernandez, Arturo Juarez, Gerardo Gomez Martinez, John Doe Caballero, real estate broker Chris Cisneros and his business MIH Realty, attorney Hector Montoya, Casin Ann McLean, and car dealer Mark "Mike" Begurski and his business Millenium Motors. Maria Dominguez and local suspects of the organization were brokering large-scale marijuana trafficking between Mexican suppliers and Jamaican distributors.

3. **MARIA ISABEL DOMINGUEZ** is the title holder of several pieces of real property and several vehicles. However, she also used nominee owners to purchase other pieces of real estate and vehicles used or intended to be used to facilitate the storage and transportation of large quantities of marijuana and U.S. Currency or representing the proceeds thereof. Dominguez received the assistance of Chris Cisneros, Mark Begurski, Hector Montoya and their commercial and professional businesses in this conduct. Maria Isabel DOMINGUEZ used proceeds from the sales of marijuana to purchase real estate, vehicles and other property in an attempt to legitimize or launder those illegal proceeds. Dominguez received the assistance of Chris Cisneros, Mark Begurski, Hector Montoya and their commercial and professional businesses in this conduct. Maria Isabel DOMINGUEZ used nominee owners to conceal her ownership of those properties and Maria Isabel DOMINGUEZ used the proceeds from the sales of marijuana to purchase several expensive real and personal properties, including vehicles. A preliminary investigation into the financial status of Maria Isabel DOMINGUEZ revealed that she is living well beyond her means. No legitimate source of income to support her lifestyle was identified and surveillance revealed that she is not lawfully employed.

4. On or about Jun 9, 2004, the Superior Court of Arizona for Pima County issued a Title III Wire Tap Order [Number 04SW0001 (ABCD)]. As a result of the electronic and



**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 physical surveillance conducted, other realty, vehicles and accomplices associated with the  
2 DOMINGUEZ Organization were identified. Those accomplices and vehicles were observed  
3 being used to facilitate the transportation of narcotics and/or U.S. Currency, or to otherwise  
4 facilitate the furtherance of the criminal enterprise identified as the MARIA ISABEL  
5 DOMINGUEZ Organization.

6  
7 Agents also used a pole camera to observe activities at the real property located at 2157 W.  
8 Jackalope, a property titled to Maria Isabel Dominguez aka Maria Ritson. Dominguez had been  
9 using the Jackalope property to stash marijuana loads. From June 17 – 21, 2004, agents through  
10 surveillance and through intercepted phone calls learned that Dominguez and members of her  
11 organization met with their Mexican suppliers of marijuana and had provided occupancy of the  
12 Jackalope property to the suppliers as collateral for loads of marijuana. Apparently, the  
13 Jamaican distributors were behind in payments to the Mexican suppliers.

14  
15 Agents learned that on June 17, 2004, Maria Dominguez and Miguel Fragoso picked up the  
16 above-captioned black 2004 Hummer H2 car from Mark Begurski of Millenium Motors.  
17 Dominguez traded in a 2003 Mercedes Benz SUV and made a \$20,000.00 cash downpayment.  
18 On June 18, 2004, agents heard a conversation in which Begurski told Dominguez and Fregoso  
19 what the costs and fees would be and that his cut would be \$15,000.00. Dominguez said she  
20 would pay the remainder in cash. Begurski confirmed receipt of a payment of \$10,000.00 in  
21 cash and said he would credit \$27,000.00 due to the value of the Mercedes Benz. Another  
22 conversation then showed that Dominguez had made the other \$10,000.00 cash payment, making  
23 up the \$20,000.00 total, and leaving a balance of \$9,000.00 owed on the Hummer H2.

24  
25 On June 25, 2004, agents watched suspect Cheryl Latoski go to that address in an SUV car,  
26 where she was met by another member of the organization who had been sent there to assist  
27 Latoski retrieve “something” from the house. Intercepted phone calls at the time revealed that  
28 Latoski and the other suspect went there to pick up a load of marijuana for transport out of town  
29 by the organization. After Latoski departed, she headed onto I-10. Agents stopped the car and  
30 found 350 pounds of marijuana in the car. Intercepted phone calls between Dominguez and  
31 other members of the organization confirmed that their agent, Latoski, and their marijuana from  
32 the Jackalope house had been intercepted by the police.

33  
34 On July 4, 2004, the Pima County Sheriff’s Department responded to a “shots fired” call in the  
35 area of Milton and Wesley. As part of that investigation the officers came into contact with the  
36 above-captioned black 2004 Hummer H2 car one block from the location of the shooting report.  
37 The temporary drive-out plates on the car were registered to Miguel Fregoso at 2157 W.  
38 Jackalope. Miguel Fregoso is the husband or boyfriend of Maria Isabel Dominguez aka Maria  
39 Ritson. Three men were in the car but none were Miguel Fregoso. One man had an outstanding  
40 warrant. In the car officers found drug paraphernalia. The officers asked TPD to respond to  
41 2157 W. Jackalope to try to contact Miguel Fregoso regarding the three men having legitimate  
42 control of the car. When TPD officers knocked on the door, two men fled from the house. They  
43 were Arturo Lopez and Erik Rolando Bejerano. Officers did a protective sweep of the house,  
44 during which they saw marijuana in the house. Officers obtained a search warrant. In the house  
45 officers found 365 pounds of marijuana in various containers and locations in the house.  
46 Officers also found a shop vac with marijuana debris in it, a suspected drug ledger, the above-  
47 captioned three cell phones which are commonly used by drug traffickers to communicate about

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 drug trafficking activity and about police scrutiny, the above-captioned two scales which are  
2 commonly used to weigh illegal drugs, the above-captioned unit and two-way radio which is  
3 commonly used to communicate and conduct counter-surveillance of police scrutiny in  
4 trafficking activity.  
5

6 On July 5, 2004, intercepted calls between Begurski and Dominguez revealed that Begurski was  
7 concerned about the discovery of the drug paraphernalia in the Hummer H2, the impounding of  
8 the car, and the discovery of the 365 pounds of marijuana in the Jackalope house. Begurski  
9 offered to put a lien on the Hummer H2 and seek to retake possession of the car from the police  
10 and hold it for Dominguez until she figured out what to do. A later call that date revealed  
11 Begurski saying he would claim he was retaking the car due to lack of payments, then sell the car  
12 and give Dominguez back some of the proceeds. Begurski said he wanted to retake and sell the  
13 car quickly because he wanted to be clear of the car because he heard DEA took the car due to  
14 drugs. One later call that day by Begurski and Dominguez revealed that Begurski told  
15 Dominguez she need not worry about the discovery of the 365 pounds of marijuana at the  
16 Jackalope house coming back to her because the whole incident would tie back to Miguel  
17 Fregoso, not to her. On July 7, 2004, an intercepted call between Begurski and Dominguez  
18 revealed that Dominguez told Begurski to leave the Mercedes Benz out of the picture and  
19 transaction papers when he went to the police and presented the title and transaction papers for  
20 the Hummer H2 car in order to try to retrieve the Hummer H2. Begurski told Dominguez to tell  
21 the police the balance was \$29,000.00, to tell the police Begurski would not take cash as a  
22 payment method, and warned her not to say anything regarding the Mercedes benz or that it was  
23 traded in or else that would endanger their efforts to get the Hummer H2 back from the police.  
24 Begurski, with the assistance of the Hector Montoya law firm, then contacted CNA and the Pima  
25 County Attorney's Office over the ensuing several weeks about getting the Hummer H2 back  
26 and presented false information and false documents regarding the Hummer H2 transaction and  
27 parties to the transaction to the police in order to try to get the Hummer H2 released. They  
28 concealed the existence of the Mercedes Benz trade-in and the way in which the actual  
29 transaction occurred and concealed information about the true relationship between Begurski and  
30 Millenium Motors and Dominguez and Fregoso and concealed information regarding the validity  
31 and purpose of the Millenium Motors lien.  
32

33 Agents continued their investigation, surveillance and phone monitoring of the organization and  
34 intercepted numerous phone calls discussing the marijuana and proceeds trafficking activities of  
35 the organization and their professional participants. Additional loads of marijuana and cash were  
36 intercepted. Additional personal, public, private and government records were discovered  
37 demonstrating the relationships and activities of the organization, including the acquisition and  
38 use and laundering of money and real and personal property.  
39

40 At the conclusion of the investigation agents searched numerous houses identified as used by and  
41 belonging to the suspects in the investigation. Agents found hundreds of pounds of marijuana in  
42 several of the houses and large amounts of cash. Agents also located numerous vehicles used by  
43 the organization in the trafficking conduct. Agents discovered additional personal and  
44 professional and financial records demonstrating the relationships and activities of the  
45 organization, including the acquisition and use and laundering of money and real and personal  
46 property. Agents arrested the suspects in the investigation. Agents also seized the personal  
47 property listed in Appendix One of the Complaint from the houses searched and the suspects

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 arrested.

2  
3 5. The following are examples of real property acquired, maintained, owned or  
4 controlled, and used or intended for use by **DOMINGUEZ** in the unlawful conduct.

5  
6 6. **3451 West Foxes Meadow:** This is the main residence of Maria Isabel  
7 DOMINGUEZ, which has been used to facilitate the sale of marijuana for sale in and out of the  
8 Tucson area.

9  
10 On June 11, 2004 Maria Isabel DOMINGUEZ arranged a meeting with “Don Chani” (Jose Adan  
11 Montoya-Cuadras) a Mexican supplier. DOMINGUEZ arranges the wire transfer of money from  
12 “Chaka” (Gary Russell) Los Angeles to a Western Union in Tucson from her home phone  
13 located at 3451 West Foxes Meadows.

14  
15 On June 25, 2004, while at the Foxes Meadow’s residence, Maria Isabel DOMINGUEZ had  
16 phone conversations with “Steve” (Marcus Maragh) indicating the transfer of marijuana to  
17 Steve’s driver Cheryl Latoski. Surveillance confirmed the transfer of marijuana at 2157 West  
18 Jackalope, which is owned by Maria Isabel DOMINGUEZ. The driver of the vehicle, Cheryl  
19 Latoski was stopped and arrested for possession of 350 pounds of marijuana.

20  
21 7. **713 North San Rafael:** This is the main residence of David Sosa-Hernandez Aka  
22 “Titi”, Maria Isabel DOMINGUEZ’s nephew and organizational lieutenant.

23  
24 On June 17, 2004 this residence was used to facilitate the showing of samples of marijuana.

25  
26 On July 9, 2004 Sonia Guadalupe Cruz-Garcia meets with David Sosa-Hernandez at the San  
27 Rafael address. Intercepted telephone conversations indicate that the meeting was to verify the  
28 amount of money that is owed to the Mexican organization that Sonia represents.

29  
30 8. **1616 West Trendwood:** This is the primary residence of Ricardo Varela, a supplier  
31 to the DOMINGUEZ Organization.

32  
33 On June 22, 2004, phone calls intercepted between DOMINGUEZ and Varela arranged a sale of  
34 marijuana to a Jamaican male identified as “Chaka”.

35  
36 Ricardo Varela was observed transporting marijuana to an apartment complex on Mission Road  
37 and was followed back to his residence on Trendwood. On August 10, 2004, a search warrant  
38 was executed at his residence. \$101,836 in of U.S. Currency was found in a safe located in a  
39 master bedroom closet.

40  
41 9. **5602 East North Wilshire:** This is the primary residence of Daniel Dominguez,  
42 brother of Maria DOMINGUEZ. Daniel Dominguez and Robert Perez own this residence.

43  
44 On June 14, 2004, Julie Hernandez contacted Maria DOMINGUEZ regarding borrowing money.  
45 Maria advised Hernandez that she would have to wait until Daniel came home so she can stop by  
46 his house at 5602 East North Wilshire and get money out of that residence.

47

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 On June 30, 2004, Maria DOMINGUEZ contacted Daniel DOMINGUEZ and wanted to stop by  
2 and drop off money. She also indicated that she did not want Miguel Fragoso (Maria's  
3 boyfriend) to know that she kept money at Daniel's house.

4  
5 On July 18, 2004, DOMINGUEZ had telephone contact with a marijuana customer by the name  
6 of "George" regarding the return of some U.S. Currency that he had deposited on a load of  
7 marijuana. DOMINGUEZ told "George" that she would meet him and give him his money  
8 back. Surveillance followed DOMINGUEZ to 5602 East North Wilshire and observed her pick  
9 up a package. Surveillance also observed a meeting at 22nd and Craycroft between Maria and  
10 "George". Shortly after, a traffic stop was conducted on "George" and approximately \$5,500  
11 was found in his possession.

12  
13 DOMINGUEZ called Daniel Dominguez and arranged to pick up money located at 5602 East  
14 North Wilshire. Surveillance verified that DOMINGUEZ arrived at the residence on July 24,  
15 2004.

16  
17 10. **1302 W Yavapai:** This is the primary residence and is owned by Santiago and  
18 Marjava Ramirez (Miguel Fragoso's sister).

19  
20 Several calls between Maria Isabel DOMINGUEZ and Marjava Ramirez indicated Marjava is  
21 setting up numerous cocaine and marijuana deals. This was confirmed between intercepted  
22 phone conversations. Also there was a conversation between Miguel Fragoso and Marjava  
23 Ramirez discussing marijuana loads.

24  
25 During the search warrant, zip lock bags with marijuana and zip lock bags with marijuana  
26 residue, and a digital scale with white residue were discovered.

27  
28 In conjunction with surveillance and intercepted phone calls it was determined that Marjava has  
29 picked up U.S. Currency via Western Union. The currency is to purchase marijuana using her  
30 name in order to conceal the identity of the DOMINGUEZ.

31  
32 11. **256 West Oklahoma:** This is the primary residence of Vincente and Sarai Melendez.  
33 It is owned by Norma and Luis Padilla. Vicente Melendez is a driver for Maria DOMINGUEZ.  
34 Sarai is the daughter of Norma Padilla. Sarai and Norma Padilla obtain cellular phones for David  
35 Sosa-Hernandez Aka "Titi" and the DOMINGUEZ organization. Sarai and Norma Padilla obtain  
36 car titles for the DOMINGUEZ organization.

37  
38 12. **1712 West Lavender Mountain Place:** This is the primary residence of Karla  
39 Juarez, wife of Arturo Juarez. Telephone calls between David Sosa-Hernandez "Titi", a  
40 marijuana broker and on one occasion, Arturo, were intercepted for a marijuana transaction.  
41 Surveillance followed David Sosa-Hernandez and Juarez to 2619 South Jaguar where both  
42 subjects stayed at the residence for a short time. Surveillance then followed a third vehicle away  
43 from the residence and a traffic stop of that vehicle revealed 176 pounds of marijuana in the  
44 vehicle that had been taken from the Jaguar residence. Several calls were made from Lavender  
45 Mountain to negotiate marijuana deals were intercepted.

46  
47 During the search warrant on August 10, 2004 \$13,500 in U.S. Currency was located inside 1712

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

West Lavender Mountain Place.

13. **2101 South Cottonwood Lane #27:** This was a stash house used by the DOMINGUEZ organization. Surveillance followed David Sosa-Hernandez and Alfredo Parra to this residence. Prior to arriving at the residence Tucson Police Department conducted a traffic stop on their vehicle. Upon completion of the stop they went to the stash house and stayed a short time. A telephone call was intercepted immediately after the stop and they discussed the reason for the stop, what was in the house.

14. **2619 South Jaguar:** This is a rental residence secured by the DOMINGUEZ Organization. There were intercepted telephone calls between Arturo Juarez and David Sosa-Hernandez regarding the purchase of marijuana.

On July 7, 2004 surveillance observed a white Yukon arrive at the Jaguar address and sees items being loaded into the white Yukon. The Yukon is stopped after leaving the Jaguar address and it is found to contain three subjects, 176 pounds of marijuana and approximately \$86,000 in U.S. Currency.

15. **275 North Sierra Vista:** This is the primary residence for Jose Montoya-Cuadras and Luis Osuna-Lugo.

Intercepted telephone conversations between Maria DOMINGUEZ, Montoya-Cuadras and Osuna-Lugo indicated that this residence was utilized for a stash house for the Organization and there had been a large amount of marijuana stored at the residence as recently as August 4, 2004.

Ground surveillance on this residence indicated an unusual amount of traffic. On 08.10.04, a search warrant was served at the residence and 389 pounds of marijuana was seized.

16. **3351 South Placita Costa Rica:** This is the primary residence for Oscar Sosa-Hernandez.

On June 26, 2004 David Sosa-Hernandez arranged a meeting with Oscar Hernandez and Alfredo Parra at Oscar's residence. Ground surveillance confirmed this meeting. Intercepted telephone conversation indicated that Oscar Hernandez and David Sosa-Hernandez are co-conspirators along with Parra and using the residence for meeting and furtherance of their criminal activity.

On July 5, 2004 telephone conversations indicate that Sosa-Hernandez has a meeting with Jesus, a Mexican supplier of marijuana Surveillance confirms this meeting.

17. **9310 East Main, Mesa, Arizona:** This residence is occupied by Alba Armenta and Cesar Armenta and was using as a temporary residence. Telephone use (Both home and cell phone) from this residence maintained contact with the DOMINGUEZ Organization. There was an intercepted telephone conversation indicating that Cesar Armenta was looking at ledgers that represented amounts of marijuana. This is also the temporary residence of David Sosa-Hernandez.

On June 27, 2004, a vehicle belonging to Sosa-Hernandez was followed to this residence of 9310

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 East Main, Mesa, Arizona. Marijuana was placed into a vehicle owned by Sosa-Hernandez. The  
2 vehicle was driven and later abandoned by Vicente Melendez. This action was confirmed by  
3 telephone interception. Surveillance and phone calls confirmed that the marijuana in the vehicle  
4 came from this address.

5  
6 18. The preliminary investigation into the financial status of Maria Isabel DOMINGUEZ  
7 reveals that she is living well beyond her financial means. No legitimate source of income to  
8 support her lifestyle has been identified and surveillance revealed that she is not lawfully  
9 employed. The following is a list of annual expenditures and vehicles that have been identified  
10 as belonging to Maria Isabel DOMINGUEZ aka "Maria RITSON".

- 11  
12 • In 2002 Maria Isabel DOMINGUEZ expenditures for vehicles was approximately  
13 \$75,000.00.  
14 • In 2003 Maria Isabel DOMINGUEZ expenditures for vehicles was approximately  
15 \$65,000.00.  
16 • In 2004 Maria Isabel DOMINGUEZ expenditures for vehicles was approximately  
17 \$70,000.00.  
18

19 19. The following is a list of vehicles that are registered to Maria I. DOMINGUEZ:

20  
21 **2002 GMC** vin. 1GKEC13Z12R180945 lic.TF1008  
22 **2004 Hummer** vin. 5GRGN23U14H119952 temp tag S350878  
23 **2003 Toyota** vin. JTEHT05JX32034270 lic.D2C352  
24 **2002 GMC** vin.1GKEC13Z12R180945 lic. 877MYV  
25 **1988 Jaguar** vin. SAJKV1642JC522561 lic. 612KPH  
26 **1994 Ford** vin. 1FALP4445RF167418 lic. 611KPH  
27 **2003 Jeep** vin. 1J4GK38K83W550137 Lic. 074NTG  
28 **2000 Ford** vin. 1FAFP44431F112905 LIC. 207NGY  
29

30 20. Examples of other persons and entities participating in and facilitating the illegal marijuana  
31 distribution and money laundering enterprise, its members, its assets, and its purpose , are as  
32 follows.  
33

34 21. **NORMA PADILLA:** The investigation revealed that **Norma PADILLA** has no  
35 legitimate income however she has three vehicles registered in her name. Intercepted phone calls  
36 reveal that she registers vehicles belonging to the DOMINGUEZ Organization in her name and  
37 also obtains cellular phones for the DOMINGUEZ Organization. The following is a list of the  
38 vehicles she has registered in her name:  
39

40 **2000 Kia** vin. KNAFB1215Y5822580 lic. 376NPE  
41 **1988 Chev.** Vin. 1G1AW51W2J6247238 lic. NBY138  
42 **1996 Chev.** Vin. 1G1JC1249T7199958 lic. 849MTN  
43

44 22. **RICARDO VARELA:** The investigation revealed that **Ricardo Varela** has no  
45 legitimate income and had an expenditure of \$10,000.00 in 2004, He owns and maintains the  
46 following three vehicles which are registered to him:

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

**2003 Honda ATV** vin. 478TE24453A310756 lic. 2DKFRV

**2001 Ford** vin. 1FTRW08L91KA21987 lic. 526GLA

**1994 Ford** vin. IFTEF14N5RLA44295 lic. S235463

23. **MARJAVA RAMIREZ:** The investigation revealed that on June 11, 2004, **Marjava Ramirez** went to a Western Union to pick-up \$5,000.00 money order for Maria DOMINGUEZ. Intercepted phone calls indicated that Maria DOMINGUEZ instructed the drug buyers to send \$5,000.00 in Marjava Ramirez's name. Ground surveillance observed Marjava arrive in the below listed vehicle at the Western Union and leave after she picked up the money. The following vehicle is registered to her:

**1997 Chev.** Vin. 3GNFK16R3VG103987 lic. 879LJW

24. **LINCOLN CLYDE DAWKINS:** The investigation revealed that "George" is an AKA for **Lincoln Clyde Dawkins**. Intercepted phone calls indicate that Maria DOMINGUEZ called him and requested that he come over to her residence and pick-up \$10,000.00. A traffic stop was conducted after the meeting with Maria and \$ 8,417.00 in U.S. Currency was seized. The following vehicle is registered to Dawkins:

**2000 Ford** vin. 1FAFP5521YG140502 lic. 090MZE

25. **JOSE ADAN MONTOYA CUADRAS:** The investigation revealed that "Don Chani" is an AKA for Jose Adan Montoya Cuadras. It also showed that Cuadras has no visible legitimate income or means of support. The following vehicle are registered to Cuadras:

**1996 Toyota** vin. JT2BG12K3T0340569 lic. M0590

**1995 Ford** vin. 1FTEX15H9SKA29381 lic. D2L855

26. **RENE FRAGOSO:** The investigation revealed that 1800 W. White Oak was a stash house on July 17, 2004. At that time, the residence was owned by Rene and Islas Fragoso. That residence has since been sold. Agents conducted surveillance on the residence and observed a black Ford Expedition bearing AZ. Plate 578BYV and a Jeep Cherokee bearing AZ. Plate MGH535. Intercepted phone conversation indicated that marijuana was stored at the residence and Rene Fragoso wanted the marijuana to be stored in the Jeep. Surveillance observed the green Jeep being utilized to deliver a load of marijuana for a Jamaican buyer. The black Ford Expedition is registered to Mr. Fragoso and the Jeep Cherokee is registered to Annette Isles, Mr. Fragoso's wife. Fragoso has no visible legitimate income. The following vehicles are registered to him and his wife:

**2002 Ford** vin. 1FMPU16L02LA26007 LIC. 578BYV (Rene)

**2000 Jeep** vin. 1J4GW48S8YC139355 LIC. MGH535 (Annette)

27. **DAVID SOSA HERNANDEZ:** The investigation revealed the David Sosa Hernandez, AKA "Titi", is a lieutenant in the Dominguez Organization and had no legitimate source of income. During physical surveillance, Sosa Hernandez was seen in the white Altima traveling between stash houses and conducting meetings within and while driving the white

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

Altima. The following vehicles are registered to Sosa-Hernandez:

**1996 Ford** vin. 2FMDA5145TBA91620 LIC. D2L802

**1999 Nissan** vin. 1N4DL01DXX212378 LIC. 676LAN

28. **ALFREDO FELIX PARRA:** The investigation revealed the Alfredo Felix Parra has no visible or legitimate means of income. Tucson Police Department conducted a traffic stop on Mr. Parra. Wrap material that is used to wrap marijuana was discovered. Ground surveillance observed Mr. Parra with Mr. Hernandez during meetings with “Joaquin”, a representative from the Mexican supplier. Mr. Parra has the following two vehicles registered in his name.

**1996 Chev.**vin. 3GCEC28K3TG132720 LIC. MEX. DYR2037

**1993 Toyota** vin. JT2EL4651P0272699 LIC. 392NKE

29. **MILLENIUM MOTORS LLC., and Mark Begurski , aka “Mike” Begurski, aka Eden Aman Naim, owner, officer, agent for Millenium Motors LLC.**

On June 27, 2004, agents observed through wire communication and physical surveillance, Maria DOMINGUEZ and Miguel Fragoso purchasing a 2004 Hummer from Mark **Begurski** of Millennium Motors. Intercepted wire communication indicated DOMINGUEZ traded in a 2003 Mercedes Benz SUV and deposited a payment of approximately \$20,000.00 to fully purchase the 2004 Hummer. The Mercedes Benz had been provided to Dominguez by her Jamaican drug customers as payment for drugs. The vehicle was registered to Jamaican co-conspirator Casin Ann McLean, girlfriend of co-conspirator Marcus Maragh, as payment for drugs. The Mercedes Benz was therefore drug proceeds. McLean and Maragh retrieved loads of marijuana from Dominguez and transported the loads of marijuana for the Jamaican drug customers. During the Mercedes Benz/2004 Hummer transaction with Millenium Motors, Millenium Motors through Mark Begurski had documents showing title to the Mercedes Benz in the name of McLean but then transferred into the name of Dominguez. Millenium Motors facilitated the transformation of the Mercedes Benz from the Jamaican drug customers to Dominguez and then into the 2004 Hummer.

Prior to the 2004 Hummer transaction, Millenium Motors through Mark begurski had conducted a transaction for Dominguez in which Dominguez acquired a Jeep Liberty by trading in a green Dodge Ram truck actually belonging to co-conspirator Miguel Fregoso (boyfriend/husband of Dominguez) but titled in the straw name of their relative, Julie Marie Hernandez. Dominguez had the Dodge Ram truck and was hiding it from Fregoso, and was able to transform it into the Jeep Liberty for her use through Millenium Motors.

On June 18, 2004 agents observed through intercepted wire communication **Begurski** stating to DOMINGUEZ and Miguel Fragoso what the cost and fees were for the 2004 Hummer. After discussing the taxes on the vehicle, **Begurski** stated his cut would be \$15,000.00, “you have to give me something.” Shortly thereafter DOMINGUEZ stated she would be paying the balance in cash. **Begurski** stated DOMINGUEZ and Miguel Fragoso already gave him \$10,000.00 and will he will subtract \$27,000.00 from the cost of the 2004 Hummer because of the trade in credit for the Mercedes Benz. Shortly thereafter, an intercepted wire communication indicated DOMINGUEZ paid another \$10,000.00 and owed approximately \$9,000.00 on the Hummer.



**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 Begurski structured the transaction and avoided and did not execute cash transaction reports for  
2 the 2004 Hummer transaction.

3  
4 On July 5, 2004, agents observed through intercepted wire communication, **Begurski** stating to  
5 DOMINGUEZ he did not like being involved in this situation; the situation was that the Pima  
6 County Sheriff's Department had seized the 2004 Hummer for having drug paraphernalia in the  
7 vehicle. **Begurski** was also aware that the vehicle registration on the 2004 Hummer returned to a  
8 residence at 2157 W. Jackalope (owned by DOMINGUEZ) where an additional 360 pounds of  
9 marijuana were seized, also on July 5, 2004. **Begurski** also stated he will place a lien on the  
10 vehicle and take it until DOMINGUEZ figures out what to do. Shortly thereafter, an intercepted  
11 wire communication indicated **Begurski** would repossess the Hummer for lack of payment, then  
12 sell the vehicle and give DOMINGUEZ back some money from the sale. **Begurski** wanted to  
13 sell the vehicle right away because he heard the DEA took vehicles because of drugs. Shortly  
14 thereafter intercepted wire communication revealed **Begurski** stating to DOMINGUEZ that she  
15 did not have to worry about the marijuana seizure of approximately 360 pounds at her residence  
16 at 2157 W. Jackalope Place in Tucson AZ affecting the 2004 Hummer because the 2004  
17 Hummer would come back to Miguel Fregoso.

18  
19 On July 7, 2004 agents observed through intercepted wire communication **Begurski** tells  
20 DOMINGUEZ Mercedes SUV out of the purchase agreement when **Begurski** presents the title  
21 and transaction papers to law enforcement retrieving the Hummer. **Begurski** then instructed  
22 DOMINGUEZ to tell authorities she owed \$29,000.00 and not \$9,000.00 since she had already  
23 made a \$20,000.00 down payment in cash. **Begurski** stated to DOMINGUEZ she needs to know  
24 this so she would know how to answer the authorities. **Begurski** intended to place a lien for the  
25 fraudulent amount of \$29,000.00 on the vehicle. **Begurski** told DOMINGUEZ to be very clear to  
26 tell the police that he would not accept cash as a payment. He also advised her what to tell the  
27 authorities as to what her financing was on the vehicle and what her monthly payments would  
28 be. **Begurski** warned DOMINGUEZ not to say anything referencing the Mercedes Benz she  
29 traded or else neither one of them would get money back for getting the Hummer out of custody.

30  
31 **Begurski** then retained the services of attorney Hector Montoya, a co-conspirator in this illegal  
32 drug enterprise, and together they contacted the police agency that had seized the 2004 Hummer  
33 and the Pima County Attorney's Office in writing and telephonically in order to carry out the  
34 plan to recover the 2004 Hummer for DOMINGUEZ and Millenium Motors. Together they  
35 submitted false paperwork and correspondence to Sgt. Jones of the Tucson/Pima Counter-  
36 Narcotics Alliance and to the Pima County Attorney's Office. The paperwork and  
37 correspondence omitted the Mercedes Benz as a down payment for the 2004 Hummer.

38  
39 On July 7, 2004, through intercepted wire communications and telephone conversations with  
40 Sgt. Jones, Mark **Begurski** knowingly and fraudulently represented Millennium Motors' conduct  
41 regarding the 2004 Hummer as as a legitimate business, conducting business in a lawful manner  
42 while he:

- 43  
44
  - Conducted vehicle transactions while knowing and/or having reason to know  
45
  - the proceeds involved are the proceeds of an offense.  
46
  - Structured financing, falsified documentation, made false statements with the intent to

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

conceal and/or disguise the nature of, location, source, ownership, or control of the property with the intent to facilitate a criminal enterprise.

- Controlled, managed, organized, directed, assisted, participated in and financed assets of an ongoing criminal enterprise.

The Millennium Motors:business, the real property on which it sits, and vehicles in its inventory and belonging to its officers and owners were seized as set forth in Appendix One to the Complaint.

The \$100,000.00 cash bond posted with Millenium Motors assets by Millenium Motors LLC Officer Jami Strey, wife of Mark Begurski, in the related criminal prosecution was also constructively seized. The bond was posted on August 14, 2004, via cashiers check number 0615202979 and remains on deposit and in the constructive trust and possession of the Clerk of Court.

**30. MIH Real Estate Investors, Inc., aka MAKE IT HAPPEN REALTY, and Chris Sisneros, aka Chris "Neros" or "Nero," owner, officer and agent for MIH Real Estate Investors, Inc.**

On July 26, 2004, agents with CNA and DEA observed through intercepted wire communication, **Chris Sisneros** stating to Maria Isabel DOMINGUEZ that he was waiting on \$3,000.00 from her brother. DOMINGUEZ stated her brother was in Las Vegas and her other brother was in Florida. She was trying to get \$20,000.00 ready for the brother in Florida.

On July 27, 2004, agents observed through intercepted wire communication and physical surveillance, **Sisneros** showing DOMINGUEZ a residence valued at approximately \$700,000.00. This residence is located at **275 Sierra Vista**. **Sisneros** instructed DOMINGUEZ to take down the "For Rent" sign in the front yard so other people would not think the residence was still for rent. Physical surveillance then observed DOMINGUEZ meet with Osuna-Lugo at the Jack-in-the-Box Restaurant. A vehicle belonging to Montoya-Cuadras arrived. Agents then observed DOMINGUEZ and the two individuals drive to the same residence **Sisneros** showed DOMINGUEZ earlier. Shortly thereafter, agents observed DOMINGUEZ depart and a black BMW driven by members of Montoya-Curadas and Osuna-Lugo organization, back into the garage of the same residence. At approximately the same time DOMINGUEZ asked **Sisneros** if he could turn on the utilities for her friends staying at the residence. Later, agents intercepted a wire communication with DOMINGUEZ stating to **Sisneros** that the person renting the residence, Robert Miller, was in Cleveland, Ohio. DOMINGUEZ asked if the electricity would be on when Miller arrived and **Sisneros** stated he would have the utilities taken care of.

On July 28, 2004, agents observed through intercepted wire communication DOMINGUEZ telling **Sisneros** that Montoya-Cuadras and Osuna-Lugo moved into another residence rented by **Sisneros** and DOMINGUEZ wanted the utilities turned on. DOMINGUEZ also stated " they were going to put it there." It is your affiant's experience and training that DOMINGUEZ was informing **Sisneros** that Montoya-Cuadras and Osuna-Lugo were going to put the marijuana load at the residence being discussed for rent. Montoya-Cuadras and Osuna-Lugo wanted to rent the residence for three months and have the utilities turned on so they could move in. DOMINGUEZ

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 also stated to **Sisneros** she was waiting for her friend, "Steve" to come to Tucson, Arizona on a  
2 Greyhound bus to "take the bill" on the other residence that **Sisneros** was holding for  
3 DOMINGUEZ. DOMINGUEZ stated that "Steve" really needed the property.

4  
5 On July 29, 2004, agents observed through intercepted wire communication DOMINGUEZ  
6 telling **Sisneros** that her people, Montoya-Cuadras and Osuna-Lugo, moved into the residence.  
7 **Sisneros** asked DOMINGUEZ if they had the \$13,000.00 for him. He stated if Montoya-Cuadras  
8 and Osuna-Lugo did not have the \$13,000.00, then he could take \$10,000.00 owed to him.  
9 **Sisneros** stated he just needed the \$10,000.00 right now and will take the balance of the money  
10 due in credit from Montoya-Cuadras and Osuna-Lugo.

11  
12 On July 30, 2004, agents observed through intercepted wire communications DOMINGUEZ  
13 stating to **Sisneros** that Montoya-Cuadras and Osuna-Lugo were "nervous because they have the  
14 stuff there." DOMINGUEZ stated to **Sisneros** that Montoya-Cuadras and Osuna-Lugo "told her  
15 that Chris told them to move." **Sisneros** stated he never told them that. **Sisneros** then stated he  
16 would call Montoya-Cuadras and Osuna-Lugo and let them know "that everything is ok".  
17 **Sisneros** asked when he was getting the money and DOMINGUEZ stated she was waiting for  
18 the truck driver to arrive; "he is not here yet and he has the money." Earlier, intercepted wire  
19 communication indicated a tractor-trailer was arriving in Tucson, Arizona to pick up a load of  
20 marijuana. DOMINGUEZ also stated she would get \$20,000-\$30,000 to **Sisneros** by this day.  
21 Then DOMINGUEZ stated she was waiting for her friend to wire \$10,000 through Western  
22 Union to Dominguez and she would give the money to **Sisneros** once she the money in hand.  
23 **Sisneros** asked, "is the other guy (Steve) coming tonight?" Dominguez stated, "yes." Shortly  
24 thereafter, intercepted wire communications indicated **Sisneros** talked to Montoya-Cuadras and  
25 Osuna-Lugo and assured "them not to worry." It is your affiant's belief that **Chris Sisneros** was  
26 letting Montoya-Cuadras and Osuna-Lugo know that it was acceptable to have a marijuana load  
27 at the residence. **Sisneros** then stated to DOMINGUEZ that he needed to get the cash  
28 immediately.

29  
30 On August 1, 2004, agents observed through intercepted wire communication DOMINGUEZ  
31 stating to **Sisneros** that Osuna-Lugo complained to her that **Sisneros** was calling him a lot asking  
32 about the money owed to **Sisneros**. **Sisneros** stated to DOMINGUEZ that he did not call Osuna-  
33 Lugo too much and asked DOMINGUEZ if she had the \$30,000. DOMINGUEZ stated she did  
34 not know how much "Steve" was bringing her and she would let him know. Shortly thereafter,  
35 intercepted wire communications between **Sisneros** and DOMINGUEZ indicated **Sisneros** was  
36 at the residence rented to Montoya-Cuadras and Osuna-Lugo. At one point during intercepted  
37 wire communications and surveillance, agents observed 600 pounds of marijuana at the  
38 residence **Sisneros** was renting to Montoya-Cuadras and Osuna-Lugo.

39  
40 On August 3, 2004, agents overheard several intercepted wire communications between  
41 DOMINGUEZ, **Sisneros** and DOMINGUEZ's attorney indicating **Sisneros** was putting up one of  
42 his properties/residences for bond with a bail bondsman. DOMINGUEZ called **Sisneros** several  
43 times instructing him to call her lawyer and the bail bondsman to verify this property being put  
44 for up for bond. **Sisneros's** actions were based on a deal with "Steve" (AKA Marcus Maragh)  
45 who was arrested on August 2, 2004. Steve's bond was set at \$250,000.00. Steve offered to buy  
46 **Sisnero's** house (valued at \$1,000,000.00) for cash once he got out of jail.

**PIMA COUNTY ATTORNEY**

32 North Stone  
14th Floor  
Tucson, AZ 85701  
520-740-5600

1 The investigation also revealed that Chris **Sisneros** drove over to the 275 Sierra Vista address on  
2 July 27, 2004. Physical surveillance and wire intercepted communications confirmed that he  
3 went to this residence at the instruction of Maria DOMINGUEZ and with Maria Dominguez  
4 present, to remove a rent sign and to prepare the residence for occupancy by Montoya-Cuadras  
5 and Osuna-Lugo.

6  
7  
8 Through intercepted wire communications and physical surveillance, **Chris Sisneros** conducted  
9 transactions while knowing and/or having reason to know:

- 10       • The proceeds involved are the proceeds of an offense.  
11       • Managed, organized, directed and financed assets of an ongoing criminal enterprise.  
12

13 The investigation has also revealed that MIH Reas Estate Investors, Inc., along with persons  
14 acting in concert with MIH, are soliciting and paying individuals to obtain title and mortgages to  
15 real property when in fact MIH and its agents control the property and make payments on the  
16 property. MIH facilitates the creation and completion of fictitious financial profiles and financial  
17 statements and lending applications for these individuals and facilitates the execution of the titles  
18 and mortgages for these individuals who would otherwise not qualify for the acquisition of these  
19 properties or the mortgages. In this manner MIH is masking the true owner of the property by  
20 fraud and forgery. Some of these properties have then been made available to the illegal drug  
21 distribution enterprise and are likely held in this manner in order to conceal the true owners and  
22 controllers of the properties and to launder the enterprise's illegal proceeds through actual or  
23 intended sales of the properties. The persons obtaining, executing and holding the titles and  
24 mortgages to the properties for financial gain are also facilitating that conduct.  
25

26 The following vehicle is registered to **Chris Sisneros**:

27  
28 2004 Black Lexus 4DSD, vin JTHBN36F840150143, AZ lic. #301NPE  
29

30 The MIH business, real property which it actually controls, real property in which it holds an  
31 interest, and vehicles in which it holds an interest and belonging to its officers and owners were  
32 seized as set forth in Appendix One to the Complaint.  
33

34 31. The facts, events, circumstances and reasonable inferences arising therefrom establish  
35 that the properties set forth in Appendix One to the Complaint are subject to seizure and  
36 forfeiture under the Racketeering, Drug and Forfeiture chapters of the Arizona Revised Statutes.  
37  
38